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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15
16 Kathleen Bliss, on behalf of herself, the
Proposed Nationwide Rule 23 Class, and the
Proposed Nevada Subclass,

17
18 Plaintiff,

19 v.

20 CoreCivic, Inc.,

21 Defendant.

Case No. 2:18-cv-01280-JAD-GWF

**SECOND STIPULATION FOR
EXTENSION OF JOINT STATUS
REPORT**

22 This is the second stipulation for extension of time to file this joint status report. Kathleen
23 Bliss (“Plaintiff”) and CoreCivic, Inc. (“CoreCivic”) (collectively, the “parties”), through their
24 respective counsel, stipulate and agree to the following:

25 WHEREAS, on June 2, 2022, the Court ordered, among other things, Defendant to
26 supplement its document production and written discovery responses, ordered the parties to meet
27 and confer, and ordered the parties to file a status report noting, among other things, whether they
28 had scheduled a subsequent meet-and-confer. (ECF No. 200.)

1 WHEREAS, on July 8, 2022, the parties filed the ordered status report, noting that they had
2 scheduled a subsequent meet-and-confer for July 21 and stating that Defendant would supplement
3 its document production and written responses again on July 28, 2022. (ECF No. 205.)

4 WHEREAS, the July 8 status report stated the parties' self-imposed deadline of August 1,
5 2022 to file a subsequent status report. (ECF No. 205.)

6 WHEREAS, the parties met and conferred on July 21, and Defendant supplemented its
7 document production and written responses on July 28.

8 WHEREAS, the parties dispute whether Defendant's July 28 production and written
9 responses are consistent with their earlier agreements and dispute whether and to what extent the
10 production and written responses are deficient or compliant.

11 WHEREAS, the dispute over the July 28 production and written responses covers many
12 topics.

13 WHEREAS, given that a subpoena response related to the underlying disputes was
14 scheduled for August 12, and that Defendant's counsel was in trial August 10-12 and had significant
15 deadlines in other class action matters between August 1 and August 12, the parties believed that
16 they, and the Court, would likely be better served by the parties meeting and conferring about their
17 disputes, narrowing the outstanding disputes for the Court's review, and submitting a status report
18 that reflects a more thorough review of the July 28 production and written responses.

19 WHEREAS, the parties subsequently stipulated to meet and confer with each other on
20 August 4 and extend the time to file their second status report from August 1 to August 17, 2022,
21 and the Court granted that request.

22 WHEREAS, at the August 4 meet-and-confer, Defendant represented that it would
23 supplement certain responses/productions by August 16.

24 WHEREAS, on August 16, Defendant represented that it could not supplement/produce
25 documents until August 17 in light of "major filings in three other class actions, and a trial in federal
26 court."

27 WHEREAS, Plaintiff will need time to review the supplemental response/production.
28

WHEREAS, the parties have an additional meet and confer scheduled for August 18 that could resolve at least some of the remaining disputes.

WHEREAS, Plaintiff subsequently filed an opposed motion for a status conference, stating that she would update the Court on August 19 of any remaining disputes, either unilaterally or through a joint status report.

WHEREFORE, the parties STIPULATE AND AGREE to extend the deadline to file their status report from August 17 to August 19.

DATED this 17th day of August, 2022.

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24 **IT IS SO ORDERED:**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 Dated: August 17, 2022